

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date filed: 02/21/2010

Name of Company covered by this certification: Orbitel Communications, L.L.C.

Form 499 Filer ID: 826072

Name of signatory: Keith A. Kirkman

Title of signatory: President/Chief Executive Officer

I, Keith A. Kirkman, certify that I am an officer of the company named above ("Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a Company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning any unauthorized access, release or disclosure of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.

A handwritten signature in black ink, appearing to read 'Keith A. Kirkman', is written over a horizontal line.

Keith A. Kirkman
President/Chief Executive Officer



Policy Statement – CPNI Compliance

Background

Customer proprietary network information (CPNI) is the data collected by telecommunications companies about a consumer's telephone calls. It includes the time, date, duration and destination number of each call, the type of services a consumer subscribes to, and any other information that appears on the consumer's telephone bill. The FCC has set forth certain guidelines for how telecommunications companies use this kind of data. Effective December 6, 2007, the FCC determined that CPNI usage requirements will also apply to cable operators who offer telephony service. As of that date, Orbitel Communications is subject to these rules. The procedures below reflect our compliance with the CPNI rules.

Policies

Through use of the PIN number management functionality in the Great Lakes Subscriber Billing System ("WinCable"), the Company has the ability to "validate" an individual to verify their identity before accessing voice service related information on the WinCable account. Before any information is disclosed either in person or over the phone to any Orbitel telephone customer, the person must provide the current PIN on the account. Use of this functionality is REQUIRED if a customer has telephone service.

1. This new functionality is available as a button from the main subscriber screen. The button will initially be **yellow** when an employee views a subscriber account in the billing system, but will change colors once the subscriber has been validated (**Green** = validated; **red** = Validation failed).
2. To validate a customer, select the Validate PIN button. Enter the 4 digit PIN and then select the Validate button.
3. For new phone customers, the staff member will need to enter the **PIN** which is established at random at the time of account set-up in the phone portal. This random PIN number must be placed on the subscriber account information in the billing system. The PIN will be given to the customer by the service technician at the time of phone service installation.
4. This CPNI PIN will also be the PIN that a customer uses to order PPV, access Cable Anytime, etc.
5. If the customer does not know their PIN, they can get no telephone related information on an account. **THERE ARE NO EXCEPTIONS TO THIS POLICY.** If a customer does not know their PIN and they wish to have information on their telephone service they must come into the office and provide a copy of their driver's license or photo id. This information must match the name on the WinCable account as that person is considered the only AUTHORIZED ACCOUNT HOLDER by FCC rules.
6. Training, review and consistent application of this policy are under the responsibility of the Vice President of Operations and Customer Service. All current personnel are fully trained on these procedures. Any new personnel are trained on this procedure as part of the standard job training procedures. Any violations of these procedures are handled through the company's disciplinary measures as outlined in the Company Personnel manual.